

# REVIEW COMMENT SHEET

Page 1 of 6

Please review the attached procedure

Number

Rev

Draft

OU6 Technical Memorandum #4, Chemicals of Concern

Title

Comment Due Date 08/04/94

☐ Internal Review

☒ Parallel Review

☐ Verification

☐ Validation

☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance Mandatory (M) comments require resolution and resolution acceptance  
1-88000-PP-004 provides complete definitions of General and Mandatory comments

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
M	III	Table of Contents	Needs list of acronyms	<i>List of acronyms has been added.</i>	
M	1-1	Introduction, Paragraph 2, Line 3	Change "probable" to "potential"	<i>Done.</i>	
M	1-4	Figure 1 1	Please simplify figure	<i>Done.</i>	
G	2-2	Surficial Soil	How were the number of samples collected determined? Were any data quality objectives considered prior to sampling?	<i>Reference to Work Plan added.</i>	
M	2-3	Subsurface soils, P 2,	What is the general depth of the fill material?	<i>7 1/2 feet: added.</i>	
M	2 6	Pond Surface Water, P 1, In 4	Was one of the five samples collected from the deepest part of each pond? Change "the" to "each"	<i>Done.</i>	

POC/Reviewer (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

☐ No Comments

☐ This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed

Mary Lee Hogg

Name

Signature

8716

Ext /Page/Fax

080/ERPD/Stuger

Bldg /Dept /AGM

08/04/94

Date

Return to

8575

FAX

Rotha Randall

Name

6924

Ext

080-533

Location

If questions on content, please call the SME

Neil Holstein

Name

6987

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NOTE These reviews will be completed by qualified reviewers in accordance with 1-88000-PP-004 in concert with 1-88000-PP-001 and 1 88000 PP 003

ADDITIONAL REVIEW

# REVIEW COMMENT SHEET (continued)

Review comments for document

OU6 COC TM

Number

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ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
M	2-6	Pond Surface Water, P 1, In 5 <i>OK</i>	Note " collected within five feet(2) of the inlet"	<i>Done.</i>	
G	2-9	Item b	Subject to spatial analysis	<i>Done.</i>	
M	2-12	Item 2 <i>OK</i>	How was the value "somewhat less than 1 percent" selected? Please be more specific	<i>Text deleted.</i>	
M	2-13	P1, In 3-4 <i>OK</i>	Delete "dermal contact"	<i>Done.</i>	
G	2-13	P 1, In 5 <i>OK</i>	Ingestion is not the chief groundwater exposure route for VOCs	<i>Done.</i>	
G	2-15	Table 2-1 Footnote #6	Did we ever get input from Region VIII toxicologist on the use of provisional toxicity factors? <i>EG&amp;G will determine - Joe Prince</i>	<i>DOE has provided/OK'd.</i>	
G	2-16	Table 2-2 <i>OK</i>	What guidance, if any, do we have on when/when not to use slope factors and daughter products? We need EG&G/DOE position on this Depends on site-specific assumptions on equilibrium	<i>EG&amp;G guidance is to use SFs with that account for daughter products.</i>	
G	3 1	Section <i>OK</i> 3 1	We need CDH screen performed on IHSS 143	<i>Agree - text clarified.</i>	
M	3 2	P 2, In 1 and table	Language and table do not agree, Does "metals and radionuclides above background levels" refer to UTL <sub>99/99</sub> ? <i>clarify</i>	<i>Text rewritten.</i>	
G	3 3	P1, In 2	Lead levels should be compared to ARARs and eliminated <i>EG&amp;G/Joe Prince</i>	<i>EG&amp;G to provide lead text.</i>	
M	3-5	Table 3 2 <i>OK</i>	Note "> Background column" - Arcolor 1254 should contain "NA", Please insert footnote "NA - Not Applicable"	<i>Done Column head revised.</i>	
M	3 6	Table 3 3	For surface soils, the more conservative RfD should have been used We should not simply default to oral	<i>Done.</i>	

POC/Reviewer (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

Mary Lee Hogg

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Signature

Date

8-5-94

Resolutions Accepted

Initials

Date

# REVIEW COMMENT SHEET (continued)

Review comments for document			OU6 COC TM Number	Rev	Draft
ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INITIAL/DATE
M	3-7	Table 3-4 <i>OK</i>	Risk should be calculated based on inhalation slope factor unless the form (e.g., refinery dust) makes it inappropriate	Done. (Nickel excluded as carcinogen; no refinery processes). Done.	
M	3-8	Table 3-5 <i>OK</i>	Risk should be calculated based on slope factors, Note "ingestion" misspelled in footnote	Done.	
M	3-9	Table 3-6 <i>OK</i>	Cite ARARs for lead	ECdG to provide lead text.	
M	3-10	Table 3-7	Metals should be reviewed more closely May be able to eliminate based on professional judgement	Mercury and nickel deleted because <1% risk factor. Others not readily excluded - all in IHSSs.	
M	4-1	Section 4-2 <i>OK</i>	Text and table do not agree, Table states analytes were <u>not</u> above background but exceed only HTLs.	Text re-written.	
M	4-2	4-3 OU Wide COC <i>OK</i> in Subsurface Soil	Is methylene chloride present in blanks? Were polynuclear aromatics closely reviewed? May be able to eliminate PAHs based on professional judgement	PAHs were detected in Triangle Area - only IHSS with SWOC analyses in subsail. MeCl results validated and accepted as real.	
M	4-3	P 1, In 2 <i>OK</i>	Lead should be evaluated once using ARARs	ECdG to provide lead text.	
M	4-6	Table 4-3 <i>OK</i>	Both RfD, and RfD, (most conservative) should be considered	Done.	
M	4-7	Table 4-4	Spatial analysis of chemicals required -- especially for common laboratory contaminants	Delta reviews did not result in eliminating the chemicals that are common lab contaminants. MeCl in several IHSS, often B-grade but accepted by validation Done. contractor (not U-qualified)	
M	4-8	Table 4-5	Same comment as Table 4-3, above	ECdG to provide lead text.	
M	4-9	Table 4-6	Lead should be eliminated through ARARs (as previously mentioned)		
M	4-10	Table 4-7 <i>OK</i>	Conduct spatial analysis of contaminants to eliminate PAHs	PAHs present in subsurface soils at Triangle Area: only IHSS (except 143) where SWOC were analyzed for in subsurface soil.	
M	5-1	Section <i>OK</i> 5-2, last P, In 2	" maximum concentrations ranged from 0.1 to 150 µg/L " For which compounds?	Clarified.	

POC/Reviewer (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

Mary Lee Hogg Name *Mary Lee Hogg* Signature *[Signature]* Date *8-5-94*

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# REVIEW COMMENT SHEET (continued)

Review comments for document			OU6 COC TM Number	Rev	Draft
ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
M	5-3	1 <sup>st</sup> bullet, in 5 <b>OK</b>	Please strengthen comment " with no relation to contaminant sources "	Rephrased.	
G	5-4	1 <sup>st</sup> bullet,	This type of analysis should be conducted for other media as well	Temporal analysis only applicable to groundwater.	
M	5-4 <b>OK</b>	last sentence	Note " (data not shown herein(2))" <b>include scatterplots</b>	Done Bis(2-ethylhexylphthalate) deleted based on spatial/temporal. All data have been reviewed/validated by validation contractor (compared to lab blanks).	others could not be removed on this basis.
M	5-5	5 4, OU-Wide Chemicals of Concern Groundwater	We need to determine if VOCs and SVOCs are coming off OU7 landfill	Organics were detected in wells down from DUT LF, and else where in OU6.	
G	5-6	5 5	Any idea as to the source of Cesium-137?	No. Deleted based on spatial/temporal.	
M	5-9	Table 5-3	How is the inhalation RfD used here?	For VOCs, most conservative RfD used.	
M	6 2	6 3, OU-Wide Chemicals of Concern in Pond Sediments	Should SVOCs be eliminated? Has bis(2-ethylhexylphthalate been compared to blanks?	SVOCs widely distributed in pond sediment. BCP was compared to lab method blanks by validation contractor.	
M		Table 6-7 <b>OK</b>	Note "concern" misspelled in title	Corrected.	
M	7 2	7 3, OU-Wide Chemicals of Concern in Pond Surface Water	Why would VOCs be in surface water?	Discussion provided. (Triquad rinsates were reviewed - resulted in "non-detect" for a couple Mecl results, but no significant impact on COCs).	

POC/Reviewer (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

Mary Lee Hogg Name Mary Lee Hogg Signature [Signature] Date 8-5-94

Resolutions Accepted Initials \_\_\_\_\_ Date \_\_\_\_\_

# REVIEW COMMENT SHEET (continued)

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Number			Rev	Draft	
ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
M	8 2	8 3 1, P 1, in 1 <i>OK</i>	Note " in stream sediments <u>indicated</u> " Replace "concluded" with "indicated"	<i>Done.</i>	
M	8 3	8 3 2, P <i>OK</i> 1, in 1	Same as above	<i>Done.</i>	
M	8 4	8 3 3, P <i>OK</i> 1, in 1	Same as above	<i>Done.</i>	
M	8 5	2 <sup>nd</sup> bullet, in 2 <i>OK</i>	Note " statistically different <u>from</u> background "	<i>Done.</i>	
M	A-1	P 2, in 3, (3) <i>OK</i>	"Professional judgement <u>for</u> statistical results"	<i>Done.</i>	
M	A-1	A 1, P 1 <i>OK</i>	Put seven categories in list format How were the 20 media-analyte groups determined?	<i>Done; explained.</i>	
M	A 2	A 2 Statistical Back- ground Compar- ison <i>OK</i>	Please clarify that reporting limits were used for non-detected analytes, but the statistical tests use 1/2 the reporting limit	<i>Has been explained for each test described in A.2.1.</i>	
M	A 2	in 5 <i>OK</i>	Please hyphenate "t-test" throughout document	<i>Done.</i>	
M	A 2	in 6 <i>OK</i>	Note " identify high concentrations <u>outside</u> of background "	<i>Done.</i>	
M	A 2	A 2 1, P 1, in 3 <i>OK</i>	Please hyphenate "p-value" throughout document	<i>Done.</i>	
M	A 3	Item 4, P 1, in 2 <i>OK</i>	Note " the data sets <u>are</u> less than "	<i>Done.</i>	

POC/Reviewer (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

POC/Reviewer Mary Lee Hogg Name Mary Lee Hogg Signature [Signature] Date 8-5-94

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ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
M	A-4	A 4 <i>OK</i> Statistical Professional Judgement	Change heading to "Professional Judgement for Statistical Results"	<i>Done.</i>	
M	A-4	A 4, P 1, In 2 <i>OK</i>	Note " the formal statistical tests failed the UTL <sub>99.9</sub> comparisons "	<i>Done.</i>	
G	A 4	A 4 P 2	I would like M Sider's opinion on this approach Is this in her "methods" paper? <i>Log normal</i> <i>M.S. will produce position paper - OK to use</i>	<i>Log-normal approach is in Gilbert letter to Ramsey. M.Siders to produce position paper.</i>	
M	A-5	P 1, In 3 5	Please clarify this approach using additional language <i>delete this</i>	<i>Paragraph deleted per M.L. Hogg.</i>	
M	A 15	Table A-8 <i>OK</i>	Define acronym NNDT	<i>Done.</i>	
M	A-40	Table A-33 <i>OK</i>	Clean up headings	<i>Done.</i>	
M	B-2	P 1, In 2 <i>OK</i>	Note " chemicals are retained for <u>separate</u> "	<i>Done.</i>	
M	B-2	P 3, In 11 <i>OK</i>	Note " ingestion rate of 2 L/day "	<i>Done.</i>	
M	B 3	B 2 In 7 <i>OK</i>	Note " above 1000 times " (delete the ')	<i>Done.</i>	
M	B-3	B 4 In 1 <i>OK</i>	Only 13 organic chemicals on Table B-3, text indicates 15	<i>Fixed.</i>	
G	B 3	B 4 <i>OK</i>	What about vinyl chloride? Text indicates no groundwater analytes exceeded 1000 X RBC Table B-3 differs	<i>Fixed.</i>	

POC/Reviewer (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

Mary Lee Hogg

Name

Signature

Date

8-5-94

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Please review the attached procedure

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TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INIT/DATE
M	—	all	need to provide a definition of acronym or 1st sentence	Done	
M	—	Exec sum	Provide an Executive Summary for this document	In preparation Done.	
M	—	all	This document needs to be added. There is no inconsistent use of numbers/abbreviations. Please use the attached guidance from EGSS's procedure writing procedure.	Done	
M	1-1	1.0	3rd P: OLG consist of 19 1455, make figure 1-1 consistent	Done	
M	—	all	Do a word search and change the following: CDH → CDPHE OLG → OLG RFP → RFETS on-site → onsite	Done	

POC/Reviewer (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)

☐ No Comments

☐ This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur

Name Rutha Randall

Signature Rutha Randall

906-6924/3573

080-533/ERP/5+19

8/8/94

Ext/Pager/Fax

Bldg/Dept/AGM

Date

Resolutions Accepted

Initials \_\_\_\_\_

Date \_\_\_\_\_

# REVIEW COMMENT SHEET (continued)

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Review comments for document: <u>Old COGTM</u>					Number	Rev	Draft
TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INIT/DATE		
M	2-2	2.2.1	lot of - table out of order	Fixed.			
M	2-7	2.2.2	2nd "bullet" - Please clarify use of data with contaminants in blanks	A sentence of clarification has been added.			
M	—	Tables	Make sure that you use slope for the rather than RFD for concentration edit out analysis that are just RFDs, add RFDs omit figure 5-8	Done  All groundwater metals in Figs retained, but text amended to emphasize that the figures show all metals > background, regardless of location, and that metals are unrelated to groundwater contamination or contaminant source areas. Rads maps included (added) Fig 5-8 omitted.			
POC/Reviewer (Comments not signed by the POC/Reviewer will be considered as unofficial comments)					Resolutions Accepted		
Name <u>Boya Randall</u> Signature <u>Boya Randall</u> Date <u>8/8/94</u>					Initials _____ Date _____		



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If questions on content, please call the SME:

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Name

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Page

1 of 2

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TYPE G or M	PAGE OR LINE #	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INITIALS
M	-	all	need to provide a definition for the document	Done	
M	-	yes sum	provide in Executive Summary for this document	Interpretation Done.	
M	-	all	also document needs to be edited. There is an inconsistent use of numbers/abbreviations. Please use the attached guidance from EGG's procedure planning procedure	Done.	
M	1-1	1.0	3rd P: OIG consist of 19 HSS, make figure 1-1 consistent	Done	
M	-	all	Do a word search and change the following: CDH → CDPHE OIG → OIG RFP → RFPs on-site → onsite	Done	

POC/Reviewer (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)

☐ No Comments

☐ This procedure revision has no impact or reference to our discipline or organization and we waive need to concur

Rotha Randall

Signature

946-6524/3573

080-533/ERPD/STAC

8/18/94

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Date

Resolutions Accepted

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Date

## REVIEW COMMENT SHEET (continued)

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Review comments for document				Number	Rev	Date
TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INITIALS	
M	2-2	2.2.1	lot 99 - table out of order	Fixed.		
M	2-7	2.2.2	2nd "bullet" - Please clarify use of data with contaminants to blanks.	A sentence of clarification has been added.		
M	—	Tables	Make sure that you can slope for the north then RTD for carcinogens edit out analysis that are just ULLS, add Rade hts, omit Figure 5-8	All groundwater metals in Figs retained, but text amended to emphasize that the figures show all metals & background, regardless of location, and that metals are unrelated to groundwater contamination or contaminant source areas. Rade maps included (added). Fig. 5-8 omitted.		

POC/Reviewer: (Comments not signed by the POC/Reviewer will be considered as unofficial comments)

Ruth Reviel Ruth Reviel 8/5/94

Name Signature Date

Resolutions Accepted

When Date

RF-47947A (2/93)

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10/10